

6

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRADLEY A. STETKIW,

Defendant.

Case:2:18-cr-20579

Judge: Roberts, Victoria A.

MJ: Majzoub, Mona K.

Filed: 08-28-2018 At 03:20 PM

SEALED MATTER

VIO: 18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 1960

---

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

18 U.S.C. § 2252A(a)(2)

*Receipt of Child Pornography*

On or about and between March of 2017, through on or about October 25, 2017, both dates being approximate and inclusive, within the Eastern District of Michigan and elsewhere, the defendant, BRADLEY A. STETKIW, did knowingly receive child pornography, that is, visual depictions of sexually explicit conduct, including, but not limited to, the lascivious exhibition of the genitals or pubic area as defined in 18 U.S.C. § 2256(8)(A); and the images received by the defendant were mailed, shipped, and transported using the Internet, a means and facility of interstate or foreign

commerce, and were mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

**COUNT TWO**

18 U.S.C. § 2252A(a)(5)(B)  
*Possession of Child Pornography*

On or about October 25, 2017, defendant, BRADLEY A. STETKIW, did knowingly possess material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8)(A), and the child pornography included depictions of prepubescent minors who had not attained 12 years of age, and the child pornography had been mailed, shipped, and transported using any means or facility of interstate or foreign commerce, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

**COUNT THREE**

18 U.S.C. § 1960

*Operating an Unlicensed Money Transmitting Business*

On or about and between July 2015, through on or about June 2017, both dates being approximate and inclusive, within the Eastern District of Michigan and elsewhere, Bradley Anthony Stetkiw, did knowingly conduct, control, manage, supervise, direct, and own all and part of a money transmitting business affecting interstate and foreign commerce, that is, a Bitcoin exchange service, which failed to comply with the money transmitting business registration requirements set forth in Title 31, United States Code, Section 5330, in violation of Title 18, United States Code, Sections 1960 and 2.

**FORFEITURE ALLEGATIONS**

18 U.S.C. § 2253; 18 U.S.C. § 982

*Criminal Forfeiture*

The allegations contained in Counts One, Two, and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253, and Title 18 United States Code, Section 982(a)(1).

Upon conviction of one or more of the offenses charged in Counts One and Two of the Indictment, defendant shall, pursuant to Title 18, United States Code, Section 2253, forfeit to the United States the following:

- a) Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, or 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- b) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c) Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Upon conviction of the offense charged in Count Three of the Indictment, defendant shall, pursuant to Title 18, United States Code, Section 982(a)(1), forfeit to the United States any property, real or personal, which constitutes, or is derived from, proceeds obtained directly or indirectly as a result of such violation and any property involved in such offense, or any property traceable to such property.

Money Judgment: Upon being convicted of violating Title 18, United States Code, Section 1960, as charged in Count Three of this Indictment, defendant shall forfeit to the United States a sum of money equal to the amount representing the total amount involved in such offense and the total amount that defendant obtained as a result of such offense.

If any of the property subject to forfeiture pursuant to Title 18, United States Code, Section 2253, and Title 18 United States Code, Section 982(a)(1), as a result of any act or omission of the defendant--

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred to, sold to, or deposited with a third party;
- c) has been placed beyond the jurisdiction of this Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty;

the United States of America intends to seek forfeiture of all other property of the defendant up to the value of forfeiture applicable in this case.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson  
Grand Jury Foreperson

MATTHEW SCHNEIDER  
UNITED STATES ATTORNEY

s/John K. Neal  
JOHN K. NEAL  
Chief, White Collar Crime Unit  
Assistant United States Attorney  
211 West Fort Street, Suite 2001  
Detroit, MI 48226-3220  
Phone: 313-226-9644  
E-Mail: John.Neal@usdoj.gov

s/Timothy J. Wyse  
TIMOTHY J. WYSE  
Assistant United States Attorney  
211 West Fort Street, Suite 2001  
Detroit, MI 48226-3220  
Phone: 313-226-9144  
E-Mail: Timothy.Wyse@usdoj.gov

Dated: August 28, 2018

**ORIGINAL**United States District Court  
Eastern District of Michigan**Criminal Case Cover Sheet**

Case: 2:18-cr-20579

Judge: Roberts, Victoria A.

MJ: Majzoub, Mona K.

Filed: 08-28-2018 At 03:20 PM

SEALED MATTER

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to com

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>Me</i>

Case Title: USA v. BRADLEY A. STETKIOWCounty where offense occurred : OaklandCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty☒ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

☐ Corrects errors; no additional charges or defendants.☐ Involves, for plea purposes, different charges or adds counts.☐ Embraces same subject matter but adds the additional defendants or charges below:Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

8/27/18  
Date

*Timothy Wyse*

Timothy Wyse  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226-3277  
Phone: (313) 226-9144  
Fax: (313) 226-2873  
E-Mail address: timothy.wyse@usdoj.gov  
Attorney Bar #:

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.